IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

MATTHEW WILSON and	§	
JOSHUA TATE, Individually and	§	
On Behalf of all Others Similarly	§	
Situated,	§	
	§	
Plaintiffs	§	
	§	
v.	§	CIVIL ACTION NO. 5:13-cv-148
	§	
	§	
ANDERSON PERFORATING, LTD	§	
d/b/a API PERFORATING	§	
	§	
Defendant	§	

DECLARATION OF JEREMI K. YOUNG

- I, Jeremi K. Young, declare and state as follows:
- 1. The statements set forth in this declaration are made of my own personal knowledge and if called as a witness, I could and would testify competently to the matters stated below.
- 2. I am the founder and sole shareholder in The Young Law Firm, P.C. I have been licensed to practice in Texas since 1999.
- 3. I have extensive experience litigating wage and hour cases throughout Texas and nationally. I have served as lead counsel or co-lead counsel in more than 65 cases (approximately one dozen filed in the Western District of Texas) brought pursuant the Fair Labor Standards Act and/or state wage and hours laws on behalf of thousands of employees. I have published articles and am regularly asked to speak on wage and hour topics at continuing education seminars.

- 4. Rhonda Luginbyhl, an associate at The Young Law Firm, P.C., has been licensed to practice law in Texas since 2010. She has participated in handling numerous wage and hour cases both as individual and collective actions.
- 5. I am familiar with the reasonable charges for legal services in matters of this type in San Antonio, Texas.
- 6. I am lead counsel in the above-referenced action. I have been involved personally in investigating and litigating this case since its inception and am familiar with the services rendered by the personnel at The Young Law Firm, P.C. in this matter. I have conducted a detailed review of the attorneys' fees and expenses incurred in this matter.
- 7. Beginning in mid-January, 2013, at the request of Mathew Wilson and Joshua Tate, The Young Law Firm, P.C. and its co-counsel, the Las Offices of Brad Boyd, P.L.L.C. ("Plaintiffs' Counsel"), began an investigation into the compensation practices of Anderson Perforating, LTD d/b/a API Perforating ("API").
- 8. On February 27, 2013, Wilson and Tate filed a collective action suit against API.
- 9. Justin Dobbs ("Dobbs") retained Plaintiffs' Counsel on March 27, 2013, and the next day gave his written consent to join the lawsuit.
- 10. On April 15, 2013, Dobb's written consent to join the lawsuit was filed with the Court.
- 11. Over the next several weeks, Dobbs, along with Wilson and Tate, worked closely with Plaintiffs' Counsel in the preparation of Plaintiffs' Motion for Conditional Certification and Notice to Potential Class Members, in settlement discussions that took

place during May and June of 2013, and in responding to Defendants' Motion to Dismiss for Lack of Subject-Matter Jurisdiction, which Defendants withdrew on July 23, 2013. In addition to providing information to Plaintiffs' Counsel informally, Dobbs worked with Plaintiffs Counsel to preparing two sworn declarations used in supporting or opposing pending motions.

12. From March 27, 2013, through June 13, 2013, the date Defendant's offer of judgment was made, The Young Law Firm, P.C. incurred attorneys' fees of \$31,702.50. The fees incurred are itemized are summarized as follows, and are detailed on Exhibit 1 to this Declaration which is incorporated as if fully set forth:

	Hours	Rate	Total
Jeremi K. Young	60.9	\$395	\$24,055.50
Rhonda K. Luginbyhl	33.8	\$195	\$6,591.00
Paralegals	9.6	\$110	\$1,056.00
Total			\$31,702.50

- 13. The hours shown on Exhibit 1 to this Declaration were actually expended on the topics stated in the "Description" column and the hours expended and rates claimed are reasonable.
- 14. The fees itemized in the table above were incurred for the common benefit of Justin Dobbs, Matthew Wilson, and Joshua Tate, who were the only three clients represented by The Young Law Firm, P.C. during the above-referenced period.
- 15. In addition, Plaintiffs have incurred additional attorneys' fees in the amount of \$4,503.00 (11.4 hours at \$395/hr.) in preparing to submit a claim for attorneys' fees on Dobbs behalf. These fees are itemized on Exhibit 2 to this Declaration which is incorporated as if fully set forth.

16. The fees above were necessary to the prosecution of this action. After a careful review of all billing entries from March 27, 2013 through June 13, 2013, and those expended in preparing the claim for Dobbs' attorneys' fees, in the exercise of billing judgment, I have no-billed certain entries that reflect the provision of clerical or secretarial services and have omitted various entries that, in my judgment, would not be charged to a client on a hourly basis (e.g. attorney time spent on clerical tasks, unnecessarily duplicative entries, or those requiring excessive time).

17. Although, The Young Law Firm, P.C. also incurred \$5,632 in fees prior to Dobbs becoming a client on March 27, 2013, and although Justin Dobbs undoubtedly benefited from much of the work done during that period (e.g. case investigation, drafting of pleadings, etc.), no recovery is requested as to those fees.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of July 2013, at Amarillo, Texas.

/s/ Jeremi K. Young